

Federal Defenders OF NEW YORK, INC.

Southern District 52 Duane Street-10th Floor, New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York Jennifer L. Brown Attorney-in-Charge

April 30, 2020

BY ECF

The Honorable Alvin K. Hellerstein Southern District of New York 500 Pearl Street New York, NY 10007

So ordered.

/s/ Alvin K. Hellerstein 4/30/2020

e: United States v. George Guldi

19 Cr. 126 (ALH)

Dear Judge Hellerstein:

We thank the Court for allowing Mr. Guldi to travel for work. We write to respectfully request that the Court amend its most recent order requiring Mr. Guldi to "notify his PTO, and provide itineraries, three days prior to each trip" to include the additional clause: "or within one hour of receipt of job confirmation when that confirmation is received less than three days prior to commencement of traveling." Mr. Guldi and his pretrial officer collaborated on this language and both agree it is acceptable.

This change is needed because the Court's order would severely limit Mr. Guldi's ability to successfully bid on jobs that need immediate pickup and delivery, which is the hallmark of the short-distance trucking he hopes to do. The source of the work for this industry is for the carriers to bid for loads on a piece work basis, using online portals such as uship.com. Mr. Guldi has learned that virtually all loads offered require shipping shortly after bid acceptance. As such, we respectfully request the above modification. If Mr. Guldi receives a job, he will immediately email his pretrial officer with his itinerary. His pretrial officer will therefore know where Mr. Guldi is at all times.

Thank you for your consideration.

Respectfully submitted,

Ian Marcus Amelkin

Assistant Federal Defender

(212) 417-8733